



Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

1214916

12-AMRP-0023

JUN 14 2012

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Office of Environmental Cleanup
Hanford Project Office
U.S. Environmental Protection Agency
309 Bradley Boulevard, Suite 115
Richland, Washington 99352

Ms. J. A. Hedges, Program Manager
Nuclear Waste Program
State of Washington
Department of Ecology
3100 Port of Benton
Richland, Washington 99354



Addressees:

TRI-PARTY AGREEMENT MILESTONE M-089-00 AND M-094-00 DELAY

The U.S. Department of Energy Richland Operations Office (RL), U.S. Environmental Protection Agency, and State of Washington Department of Ecology discussed an extension to the Tri-Party Agreement Milestones M-089-00, "Complete Closure of Non-Permitted Mixed Waste Units in the 324 Building REC B-Cell, REC D-Cell, and High Level Vault," due September 30, 2012, and M-094-00, "Complete Disposition of 300 Area Surplus Facilities," due September 30, 2015. This is due to discovery of the Waste Site 300-296 under the B-Cell of the 324 Building. Characterization efforts to date, have led to a modified multiphased approach to the 324 Building demolition to utilize part of the remaining building structure to safely remove the high source term in the newly discovered waste site. Due to existing priorities for removal of chrome contaminated sites in 100 Areas, activities for the 324 remediation is being delayed and new interim milestones are being proposed to reflect the path forward.

Based on the above, RL is providing the attached Tri-Party Agreement Change Package to address the delay of the 324 Closure, the 324 Removal Action, and the 300-296 Remedial Action. We look forward to working with you and your staff to achieve remediation and removal of these sites at and under the 324 Building.

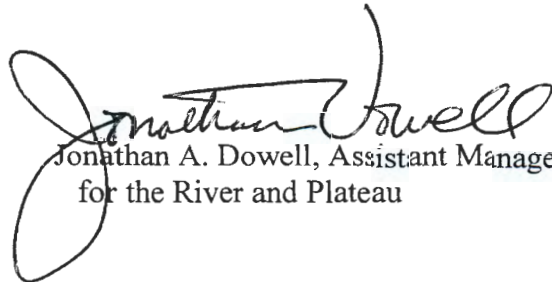
Addressees
12-AMRP-0023

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If you have any questions, please contact me or your staff may contact Mark French, of my staff, on (509) 373-9863.

Sincerely,



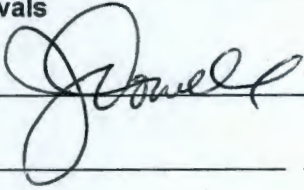
Jonathan A. Dowell, Assistant Manager
for the River and Plateau

AMRP:RFG

Attachment

cc w/attach:

G. Bohnee, NPT
F. W. Bond, Ecology
L. Buck, Wanapum
L. M. Dittmer, CHPRC
P. E. Eberlein, Ecology
L. E. Gadbois, EPA
S. Harris, CTUIR
R. Jim, YN
R. A. Kaldor, MSA
S. L. Leckband, HAB
N. M. Menard, Ecology
K. Niles, ODOE
T. W. Noland, MSA
R. E. Piippo, MSA
D. Rowland, YN
D. M. Yasek, WCH
Administrative Record
Environmental Portal

Change Number M-89-12-01	Federal Facility Agreement and Consent Order Change Control Form <small>Do not use blue ink. Type or print using black ink.</small>	Date June 12, 2012
Originator M. S. French (U. S. Department of Energy Richland Operations Office [DOE])		Phone (509) 373-9863
Class of Change <input checked="" type="checkbox"/> I - Signatories <input type="checkbox"/> II - Executive Manager <input type="checkbox"/> III - Project Manager		
Change Title Extension of Tri-Party Agreement Milestone M-089-00 due to radiological contamination found below the 324 B-Cell.		
Description/Justification of Change <p>The Tri-Party Agreement M-089-00 Major Milestone governs closure of non-permitted mixed waste units in the 324 Building radiochemical engineering complex (REC) B-Cell and D-Cell, and the high level vault, while M-016 Milestones govern remediation and M-094-00 governs demolition of 300 Area facilities. Due to the discovery of the 300-296 waste site under the 324 Facility, the M-089-00 and M-094-00 Milestones cannot be met. 300-296 will impose delays on closure, removal actions, and remedial actions near and at the 324 Complex (324, 324A, 324B, 324C, 324D, and 324S).</p> <p>Characterization of the suspected contamination involved installing a series of closed-end steel tubes, which measured radioactivity at rates up to 8,900 roentgens per hour beneath the B-Cell floor. A strategy has been developed to remotely remove the B-Cell floor and remediate the most concentrated waste material directly beneath the foundation. Demolition of the 324 Complex will be performed after remote remedial actions have been completed to optimize use of the facility and its ventilation system to safely perform the work and mitigate risk to workers and the environment.</p> <p>Due to prioritization of resources to support 100 Area chromium remediation activities, work around 324 has been paused. A new interim milestone is being established to address the start of remediation of 300-296 as well as a new interim milestone being added to address removal of 300 Area facilities other than the 324 Complex.</p> <p>Description/Justification of Change continued on next page.</p>		
Impact of Change This change extends the completion date of M-089-00 and M-094-00, adds interim milestones for remediation of 300-296, and sequencing of removal actions of the 324 Complex.		
Affected Documents Hanford Federal Facility Agreement and Consent Order, Appendix D, will be altered to reflect changes in milestone description and due date. Hanford Site internal planning management and budget documents.		
Approvals <div style="display: flex; justify-content: space-between; align-items: flex-start;"> <div style="width: 30%;"> DOE  </div> <div style="width: 30%;"> Date <u>6.14.12</u> <input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved </div> <div style="width: 30%;"></div> </div> <div style="display: flex; justify-content: space-between; align-items: flex-start; margin-top: 10px;"> <div style="width: 30%;"> EPA _____ </div> <div style="width: 30%;"> Date _____ <input type="checkbox"/> Approved <input type="checkbox"/> Disapproved </div> <div style="width: 30%;"></div> </div> <div style="display: flex; justify-content: space-between; align-items: flex-start; margin-top: 10px;"> <div style="width: 30%;"> Ecology _____ </div> <div style="width: 30%;"> Date _____ <input type="checkbox"/> Approved <input type="checkbox"/> Disapproved </div> <div style="width: 30%;"></div> </div>		Page 1 of 2

Description/Justification of Change (continued):

The 324 Complex containment structure and system must remain intact in order to safely perform the complex work required to remotely remediate the contamination below B-Cell. Remediation of the waste site via the hot cell is needed in order to reduce the potential for airborne release of the radioactive material, as well as water intrusion that could cause contaminant migration. Thus, closure and removal of the structure will be performed after remote remedial actions of high dose wastes have been completed.

Authorized Changes:

Hanford Federal Facility Agreement and Consent Order Interim Milestone is modified or created as shown below using ~~strikeout~~ to indicate text deletions and underlined to indicate text additions:

Milestone Number	Milestone Description	Completion Date
M-089-00	Complete closure of Non-permitted mixed waste units in the 324 Building REC B-Cell, REC D-Cell, and high level vault.	09/30/2012 <u>TBD</u>
M-094-00	Complete disposition of 300 Area surplus facilities identified in the removal action work plan(s) for the 300 Area facilities. Completion of facility disposition is defined as the completion of deactivation, decontamination, decommissioning, and demolition of deactivation, decommissioning, and demolition and obtain EPA and/or Ecology approval of the appropriate project closeout documents. The cleanup of 300-FF-2 Waste Sites associated with 300 Area surplus facilities and utilities will be performed in accordance with M-016-00B, M-016-69, and approved Remedial Design/Remedial Action Work Plan for 300 Area waste sites by the specified due date as approved in the removal or Remedial Action Work Plans	09/30/2015- <u>TBD</u>
<u>M-094-10</u>	<u>Complete disposition of 300 Area surplus facilities, except for the 324 Complex, identified in the removal action work plan(s) for the 300 Area facilities.</u> <u>Completion of facility disposition is defined as the completion of deactivation, decontamination, decommissioning, and demolition of deactivation, decommissioning, and demolition and obtain EPA and/or Ecology approval of the appropriate project closeout documents. The cleanup of 300-FF-2 waste sites associated with 300 Area surplus facilities and utilities will be performed in accordance with M-016-00B, M-016-69, and approved Remedial Design/Remedial Action Work Plan for 300 Area waste sites by the specified due date as approved in the removal or Remedial Action Work Plans</u>	<u>September 30,</u> <u>2015</u>
<u>M-094-11</u>	<u>Establish new milestones for removal actions necessary to support remediation of 300-296.</u>	<u>TBD</u>
<u>M-016-xxx</u>	<u>Initiate remediation of the high dose rate 300-296 Waste Site under the 324 Facility</u>	<u>TBD</u>